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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

10 **QUALITY PRODUCTS, INC., a**
11 **California corporation,**

12 **Plaintiff,**

13 **v.**

14 **VERKA FOOD PRODUCTS LTD., a**
15 **Canadian company; GAGANDEEP**
16 **SINGH MATTA, an individual, VERKA**
17 **FOOD INTERNATIONAL LTD., a**
18 **Canadian company; and DOES 1 through**
19 **10, inclusive,**

20 **Defendants.**

No. 2:17-cv-01418

**STIPULATED MOTION TO CONTINUE
DEADLINE TO SUBMIT JOINT STATUS
REPORT AND DISCOVERY PLAN AND
PROPOSED ORDER**

21 Plaintiff Quality Products, Inc. ("Plaintiff" or "Quality Products") and Defendants Verka
22 Food Products, Ltd., Verka Food International Ltd., and Gagandeep Singh Matta (collectively
23 "Defendants") herby submit this Stipulated Motion to continue the deadline to submit their Joint
24 Status Report and Discovery Plan which is currently due December 11, 2017. For the Court's
25 convenience, the parties have attached a Proposed Order.

26 Defendants were served with the complaint on November 16, 2017. On November 27, 2017,
Plaintiff's counsel and Mr. Matta held a phone conference in which they discussed items in Fed. R.
Civ. P. 26(f) and Local Civil Rule 26(f)(1). On that date, Defendants were not yet represented by

1 counsel. Subsequently, Defendants retained FisherBroyles LLP. On December 5, 2017, the parties
2 filed a Stipulation, and on December 6, 2017, the Court entered an Order, extending to December
3 26, 2017, Defendants' deadline to respond to the Complaint.

4 Plaintiff provided its draft of the Combined Joint Status Report and Discovery Plan ("the
5 Report") to Defendants' counsel on December 11, 2017. Because Defendants' counsel did not meet
6 and confer with Plaintiff's counsel, the parties believe that it would be beneficial to extend the filing
7 deadline for the Report to allow for a second meet and confer and to allow Defendants' counsel
8 sufficient time to contribute to the Report.

9 In light of the above, the parties request a brief continuance of the deadline to file a
10 Combined Joint Status Report and Discovery Plan from December 11, 2017 to December 18, 2017,
11 or to another date the Court deems appropriate.

12 Dated: December 11, 2017

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1 Dated: December 11, 2017

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13 **ORDER**

14 Based on the foregoing stipulated motion of the parties and good cause appearing,
15 therefore it is so ordered that the time for the parties to file their Combined Joint Status Report
16 and Discovery Plan is hereby extended to December 18, 2017.

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18 **HON. MARSHA J. PECHMAN**
19 **United States District Court Judge**

20 Presented by:

21 **CARNEY BADLEY SPELLMAN, P.S.**
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23 **Products, Inc.**

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CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2017, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

/s/Andrew Holland
Andrew P. Holland